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July 29, 2020

BY ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Mario Alberto Ramos et al.*, 20 Cr. 29 (JPO)

Dear Judge Oetken:

I represent Lorenzo Maciel Solorio, one of the co-defendants in the above-cited matter, which is scheduled for a status conference tomorrow, July 30, 2020, at 2:30 pm. I write on behalf of all defendants and with the consent of the government to request a 45-day adjournment of the status conference. This is the first request for an adjournment.

My client is currently detained at the Metropolitan Detention Center and has a strong desire to appear in person at the next court conference. Under the current public health crisis, it is my understanding that he will not be produced for tomorrow's appearance. I have conferred with co-counsel cc'ed here as well as with the government, and no party objects to an adjournment of this matter. I understand that the Court's practices generally require 72-hour advance notice for such a request, but given the process and timing of scheduling counsel calls with clients detained at the MDC, I was only able to speak with my client about the upcoming conference late yesterday, when he expressed his strong interest in appearing in person in Court.

For the foregoing reasons, I request that this Court adjourn the status conference currently scheduled for July 30, 2020. Should the Court do so, I have confirmed with co-defendants' counsel that all defendants would consent to the exclusion of time under the Speedy Trial Act, as the ends of justice (including the interests of the individual charged with the crimes here to) outweigh the public interest in a speedy trial.

Granted. The pretrial conference is hereby adjourned to September 16, 2020, at 11:00 a.m. Time is excluded through September 16, 2020, under the Speedy Trial Act, 18 U.S.C § 3161(h)(7)(A), the Court finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial.

So ordered: 7/29/2020

Respectfully,

/s/ Megan W. Benett

Megan W. Benett

Attorney for Maciel Solorio

A handwritten signature in blue ink, appearing to read "J. Paul Oetken", written over a horizontal line.

J. PAUL OETKEN
United States District Judge

Los Angeles